



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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August 26, 2013

Mr. David Libman
Fort Pulaski National Monument – GMP
National Park Service
Southeast Regional Office
Planning and Compliance Division
100 Alabama St., 1924 BLDG
Atlanta, GA 30303

SUBJECT: EPA Comments on the Final Environmental Impact Statement (FEIS) for the
Fort Pulaski National Monument, Draft General Management Plan, Wilderness
Study and Environmental Impact Statement
Savannah, Chatham County, Georgia
CEQ #: 20130219

Dear Mr. Libman:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (FEIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The National Park Service (NPS) proposes changes to General Management Plan for the Fort Pulaski National Monument. The purpose of the FEIS is to provide a comprehensive management plan that helps the NPS fulfill the national monument purpose, maintain its significance, and protect its resources for present and future generations. The FEIS also includes a wilderness study that evaluated options for designating wilderness areas at Fort Pulaski.

Fort Pulaski is located between Savannah and Tybee Island on the Georgia coast. The site contains 5,365 acres on Cockspur and McQueens islands. The Fort was declared a national monument on October 15th, 1924, under the authority of Section 2 of the Antiquities Act. In 1936, Fort Pulaski was expanded to include all lands on Cockspur Island, and donated lands, easements and improvements on McQueens and Tybee islands. According to the FEIS, the Fort was built to help “protect the eastern seaboard cities after the British burned the city of Washington during the War of 1812.” In 1862, “the bombardment of Fort Pulaski by rifled cannons during the Civil War resulted in the breach of its “invincible” walls and the surrender of its garrison to Union forces (pg 3).”

The FEIS examines three alternatives for managing Fort Pulaski for the next 20 years. It analyzes the impacts of implementing each of the alternatives. Alternative A is the “no action”

alternative that continues current park management strategies and serves as a basis for comparison in evaluating the other alternatives. Alternative B is the NPS's preferred alternative that emphasizes the restoration of the cultural landscape of Cockspur Island similar to the 1862 period of significance. This alternative involves tree removal and relocating the visitor parking lot to an area not visible from the terreplein (gun deck) of the Fort. Alternative C emphasizes a wider range of interpretive themes including natural resources and historic periods. This alternative places less emphasis on historic landscape restoration and views. Both "action" alternatives include a proposal to construct a new visitor's center annexes that will be described in a future planning project.

EPA notes that the FEIS discusses the decision-making process known as "Choosing by Advantages" that was used to select the preferred alternative. The scores resulting from the process were similar for Alternative B and C; however, Alternative B would restore the 1862 viewshed, protect cultural resources like the veterans cemetery, remove more exotic and invasive species and provide better interpretation opportunities due to the proposed restoration of most historic site conditions and views. Alternative B would also impact more trees which the FEIS indicates would be mitigated. The NPS should always consider proposed tree loss and mitigation. For example, considering approximately how much more vegetation or tree loss may be impacted by Alternative B compared to C and describe potential mitigation in terms of tree replacement ratios, replacement species/types of trees or consistency with any tree replacement guidelines, etc.

The FEIS discusses the NPS's efforts to comply with the Endangered Species Act and Section 106 of the National Historic Preservation Act. While the NPS describes various coordination efforts, the NPS should document resource agency formal consultations including concurrence with the NPS's determination that the proposed project is not likely to adversely affect any federally threatened or endangered species and Section 106 determinations regarding the relocation of the parking area for the Mission 66 visitor center.

The NPS conducted a wilderness study for Fort Pulaski related to lands that were previously found eligible for wilderness designation. Based on a wilderness eligibility assessment, approximately 4,500 acres of tidal salt marsh at McQueen's island were found eligible. Both action alternatives propose the same amount of acreage for designation as part of the National Wilderness Preservation System. EPA supports the preservation of the salt marsh areas at Fort Pulaski as proposed by the NPS. This designation would help to preserve and protect the natural state of the salt marsh, and provide for "compatible recreational opportunities, education, and scientific study."

In the spirit of collaboration and technical assistance the EPA recommends some sustainability concepts which could be considered in the final management plan.

Green Building

Green building is the practice of creating structures and using processes that are environmentally responsible and resource-efficient throughout a building's life-cycle from design to, construction, operation, maintenance, renovation and deconstruction. This practice expands

and complements the classical building design concerns of economy, utility, durability, and comfort. Green building is also known as a sustainable or high performance building.

Green buildings are designed to reduce the overall impact of the built environment on human health and the natural environment by:

- Efficiently using energy, water, and other resources
- Protecting occupant health and improving employee productivity
- Reducing waste, pollution and environmental degradation

For example, green buildings may incorporate sustainable materials in their construction (e.g., reused, recycled-content, or made from renewable resources); create healthy indoor environments with minimal pollutants (e.g., reduced product emissions); and/or feature landscaping that reduces water usage (e.g., by using native plants that survive without extra watering).

In the United States, buildings account for:

- 39 percent of total energy use
- 12 percent of the total water consumption
- 68 percent of total electricity consumption
- 38 percent of the carbon dioxide emissions

Potential benefits of green building can include:

Environmental benefits

- Enhance and protect biodiversity and ecosystems
- Improve air and water quality
- Reduce waste streams
- Conserve and restore natural resources

Economic benefits

- Reduce operating costs
- Create, expand, and shape markets for green product and services
- Improve occupant productivity
- Optimize life-cycle economic performance

Social benefits

- Enhance occupant comfort and health
- Heighten aesthetic qualities
- Minimize strain on local infrastructure

Green Parking

Green parking refers to several techniques that when applied together reduce the contribution of parking lots to total impervious cover. From a storm water perspective, green

parking techniques applied in the right combination can dramatically reduce impervious cover and, consequently, reduce the amount of storm water runoff. Green parking lot techniques include: setting minimums of permanent parking spaces; minimizing the dimensions of parking lot spaces; utilizing alternative pavers in overflow parking areas; using bioretention areas to treat storm water; encouraging shared parking.

Green parking lots can dramatically reduce the creation of new impervious cover. How much is reduced depends on the combination of techniques used to achieve the greenest parking. While the pollutant removal rates of bioretention areas have not been directly measured, their capability is considered comparable to a dry swale, which removes 91 percent of total suspended solids, 67 percent of total phosphorous, 92 percent of total nitrogen, and 80-90 percent of metals (Claytor and Schueler, 1996).

North Carolina's Fort Bragg vehicle maintenance facility parking lot is an excellent example of the benefits of rethinking parking lot design (NRDC, 1999). The redesign incorporated storm water management features, such as detention basins located within grassed islands, and an onsite drainage system that exploited existing sandy soils. The redesign reduced impervious cover by 40 percent, increased parking by 20 percent, and saved 20 percent or \$1.6 million on construction costs over the original, conventional design.

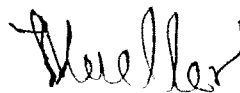
Briefly three other sustainable activities which may be applicable to the Park Service's general management plan are as follows:

- **Green Detention Ponds**
- **Rain Water Harvesting**
- **Rain Gardens**

Again, EPA supports the preservation of 4,500 acres of salt marsh at Fort Pulaski. We appreciate the NPS balancing visitor experience needs and enhancing recreational opportunity with the need to protect sensitive cultural and ecological resources. We understand that Alternative B balances those needs.

We appreciate the opportunity to review the proposed action. Please contact Ken Clark at (404) 562-8282 if you have any questions or want to discuss our comments.

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Environmental Accountability